

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
UNITED STATES OF AMERICA	:	
	:	
- v. -	:	<u>PROTECTIVE ORDER</u>
	:	S3 20 Cr. 57 (GBD)
WILLIE EVANS,	:	
	:	
Defendant.	:	
- - - - -	x	

Upon the application of the United States of America, DAMIAN WILLIAMS, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Peter J. Davis and Rushmi Bhaskaran, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972), and the Government's general disclosure obligations or practices, relating to (1) witnesses the Government anticipates may be called to testify at trial, and (2) individuals the Government does not anticipate calling at trial (collectively, the "3500 Material"), made on consent, and based on the Court's independent review, it is hereby

ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; (2) the defense is precluded from disseminating any

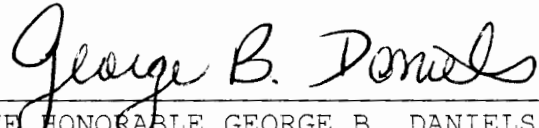
of the 3500 Material (and any copies thereof) to anyone beyond the defendants, defense counsel, and any paralegal or staff employed by the defense; and (3) the defendant is precluded from taking any 3500 Material (or any copies thereof) with them into any jail facility, or possessing any 3500 Material or copies thereof in any jail facility, either before, during, or after trial; except that the defendant may review 3500 Material, in the possession of defense counsel and/or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense; and (4) all 3500 Material designated "ATTORNEY'S EYES ONLY" and shall not be disseminated to or discussed with the defendant or anyone else beyond defense counsel and any paralegal or staff employed by the defense - nor shall the names of witnesses reflected in any ATTORNEY'S EYES ONLY 3500 Material be disclosed to the

defendant.

FURTHER ORDERED that if counsel for the defendant determines that the information provided is material and relevant to the investigation and defense of their clients and requires counsel to share the information subject to this protective order with their clients, counsel for the defendant reserve the right, on notice to the Government, to seek permission from the Court to do so.

Dated: New York, New York

~~JUN 26 2023~~

  
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THE HONORABLE GEORGE B. DANIELS  
UNITED STATES DISTRICT JUDGE